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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PARMOD K. GARG, an individual,
Plaintiff,

v.

IDS PROPERTY CASUALTY INSURANCE
COMPANY, a foreign corporation that does
business as Ameriprise Auto & Home
Insurance; BARBARA K. CEGAVSKE, as
Secretary of the State for the State of Nevada;
and DOES and ROE entities I – X, inclusive,
Defendants.

CASE NO.: 2:20-cv-157-JAD-NJK

**STIPULATION TO WITHDRAW
MOTION TO DISMISS (ECF NO. 3) AND
MOTION TO REMAND TO STATE
COURT (ECF NO. 4); AND
STIPULATION TO DISMISS
DEFENDANT BARBARA K. CEGAVSKE**

Defendant IDS Property Casualty Insurance Company (“Defendant”) and Plaintiff Parmod K. Garg (“Plaintiff”) (collectively, the “Parties”), by and through their attorneys of record, hereby stipulate to withdraw Defendant’s Motion to Dismiss (ECF No. 3) and Plaintiff’s Motion to Remand to State Court (ECF No. 4) respectively. The parties also stipulate to the dismissal of Defendant Barbara K. Cegavske, as Secretary of State for the State of Nevada (“NVSOS”). Further, the Parties stipulate to allow Plaintiff leave to amend Plaintiff’s Complaint to remove references to NVSOS from the Complaint, including dismissal of Plaintiff’s Fifth Claim for Relief, as well as to amend the perceived pleading deficiency in Plaintiff’s Fourth Claim for Relief. The Parties agree that Plaintiff shall have fourteen (14) days from the date of the Court’s entry of order on this stipulation to file his amended Complaint. Each party shall bear its own attorney’s fees and

1 costs related to the filing and withdrawal of both motions (ECF Nos. 3 and 4).

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3 By /s/ Anthony B. Golden
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By /s/ Benjamin J. Carman
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Casualty Insurance Company

7 **ORDER**

8 IT IS SO ORDERED

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UNITED STATES DISTRICT JUDGE

11 DATED: 2/28/2020
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